

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

MYNETTE TECHNOLOGIES, INC.)	
and STEVEN M. COLBY,)	
)	
Plaintiffs,)	Case No. 16-cv-01647-RTH
)	
v.)	Judge Ryan T. Holte
)	
THE UNITED STATES,)	
)	
Defendant,)	
)	
and)	
)	
GEMALTO, INC. and IDEMIA IDENTITY)	
& SECURITY USA LLC,)	
)	
Intervenor-Defendants.)	
)	

DEFENDANT’S MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT SUBMISSIONS

WHEREAS, on December 5, 2022, the Court issued an Opinion and Order granting-in-part Defendants’ Motion for Sanctions. (ECF No. 153)

WHEREAS, in the Opinion and Order, the Court ordered the parties to, *inter alia*, jointly (i) file a motion to vacate the Court’s protective order (ECF No. 74) by December 19, 2022, (ii) file a stipulated amended protective order including a covenant not to sue consistent with the Opinion and Order by December 19, 2022, and (iii) file a joint status report proposing a timeline for further proceedings consistent with the Court’s Opinion and Order by January 4, 2023.

WHEREAS, the Court has granted previous requests for extensions of those dates, and the current deadlines are: the deadline for the Joint Motion to Vacate the Protective Order and

Stipulated Amended Protective Ordering containing a covenant not to sue is May 12, 2023; and the deadline for a joint status report proposing a timeline for further proceedings is May 19, 2023. *See* April 21, 2023 Court Order.

WHEREAS, the parties are continuing to attempt to negotiate the proposed covenant and Plaintiffs have represented that more time would potentially allow the parties to reach agreement or otherwise narrow the issues.

WHEREAS, Plaintiffs and Gemalto have requested that the Court grant their joint request for a further two week enlargement of time but were unable to reach counsel for the Government in the hours prior to their joint filing.

THEREFORE, the United States respectfully concurs in Plaintiffs' and Gemalto's Joint Motion (ECF No. 167) and requests that the Court grant that motion as well as the present motion for the same two-week enlargement of time. With this enlargement, the deadline for the Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Ordering containing a covenant not to sue would be May 26, 2023, and the deadline for a joint status report proposing a timeline for further proceedings will be June 2, 2023.

Respectfully submitted,

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Director

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May 12, 2023